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10 *Attorneys for Fire Victim Trustee*

11 **UNITED STATES BANKRUPTCY COURT**  
12 **NORTHERN DISTRICT OF CALIFORNIA**  
13 **SAN FRANCISCO DIVISION**

13 In re:  
14 **PG&E CORPORATION,**  
15 **PACIFIC GAS AND ELECTRIC COMPANY,**  
16 **Debtors.**

16 ☐ Affects PG&E Corporation  
17 ☐ Affects Pacific Gas and Electric Company  
18 ☒ Affects both Debtors

18 *\* All papers shall be filed in the Lead Case,*  
19 *No. 19-30088 (DM).*  
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Case No. 19-30088 (DM)  
Chapter 11  
(Lead Case)  
(Jointly Administered)

**FIRE VICTIM TRUSTEE'S  
STATEMENT OF NON-  
OPPOSITION TO  
CONSOLIDATED MOTIONS TO  
DEEM LATE-FILED CLAIMS  
TIMELY FOR THE PURPOSE  
OF CLAIM ADMINISTRATION  
BY THE FIRE VICTIM TRUST**

[Relates to Docket Number 12906]

1 Cathy Yanni, in her capacity as the Trustee (the “**Trustee**”) of the Fire Victim Trust (the  
2 “**Trust**”), by and through her undersigned counsel and as directed by the *Order Consolidating*  
3 *Motions to File Late Claims* entered August 24, 2022 [Docket No. 12875] (the “**Consolidation**  
4 **Order**”) and the *Order re Supplemental Exhibit to Order Consolidating Motions to File Late*  
5 *Claims* entered September 1, 2022 [Docket No. 12923] (the “**Supplemental Consolidation**  
6 **Order**”), respectfully states as follows:

7 1. The Trust has been monitoring all motions filed with this Court that seek to have  
8 late-filed proofs of claim deemed “timely” for the purpose of having such claims administered by  
9 the Trust.<sup>1</sup>

10 2. In keeping with current Trust policy, the Trustee does not oppose the *Consolidated*  
11 *Motion to Allow/Deem Timely Late Filing of Claimants, and Memorandum of Points and*  
12 *Authorities and Declaration of Peter Simon in Support Thereof* [Docket No. 12906] (the “**Late**  
13 **Claim Motion**”) with respect to the claimants listed on Exhibit A hereto. Given the number of late  
14 claim motions filed in recent months<sup>2</sup> and the amount of time that has passed since the December  
15 31, 2019 bar date for Fire Victim Claims and the February 26, 2021 deadline to submit claims  
16 questionnaires to the Trust, the Trustee will be discontinuing the current non-opposition policy with  
17 respect to late claim motions filed after September 30, 2022.

18 3. The proofs of claim listed on Exhibit A and any claims asserted in connection with  
19 such proofs of claim are subject to the requirements of the CRP and are not allowed or approved by  
20 the filing of this statement. Nothing herein shall be construed to be a waiver by the Trust of any  
21 right to object to the proofs of claim listed on Exhibit A or any claims asserted in connection with  
22 such proofs of claim on any grounds other than the untimely filing thereof.

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24 <sup>1</sup> The Fire Victim Trust Claims Resolution Procedures (“**CRP**”) mandate that claimants must have  
25 timely filed a proof of claim to be eligible to receive compensation from the Trust. See CRP §I.

26 <sup>2</sup> Of the 394 late claim motions filed since the December 31, 2019 extended bar date, 216 have been  
27 filed in the last six months and 161 were filed in August alone. To put these numbers in perspective, in  
28 2020, which included the months immediately after the Extended Bar Date and the effective date of the  
Trust (both events that could be expected to prompt the filing of late claim motions), the total number of late  
claim motions filed alleging Fire Victim Claims was 55. In 2021, the total number was only 22.

1 DATED: September 14, 2022

BROWN RUDNICK LLP

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By: /s/ Eric R. Goodman  
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**EXHIBIT A**  
LIST OF CLAIMANTS

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| <b>DATE<br/>POC FILED</b> | <b>POC NO.</b>                      | <b>CLAIMANT(S)</b>   |
|---------------------------|-------------------------------------|--|
| 8-19-2022                 | 108782                              | Richard Baum   |
| 8-19-2022                 | 108783                              | Dustin Baxter, Tamara Baxter,<br>Blaine Baxter and Reid Baxter |
| 8-23-2022                 | 108811                              | Dolores Meyer and Bradley Meyer                                |
| 1-6-2020<br>8-30-2022     | 96365<br>108833<br>(Amending 96365) | David Qin  |
| 1-8-2020<br>8-30-2022     | 96435<br>108860<br>(Amending 96435) | Lynn Marie Didier  |
| 8-30-2022                 | 108861                              | William Klemme   |
| 8-30-2022                 | 108866                              | E. Lawrence Armstrong<br>and Karen Jacobson Armstrong          |